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Proposed Liaison Counsel
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MAINE STATE RETIREMENT
SYSTEM, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

v.

COUNTRYWIDE FINANCIAL
CORPORATION, a Delaware
corporation; COUNTRYWIDE HOME
LOANS, INC.; CWALT, INC., a
Delaware corporation; CWMBS, INC.,
a Delaware corporation; CWABS,
INC., a Delaware corporation;
CWHEQ, INC., a Delaware
corporation; COUNTRYWIDE
CAPITAL MARKETS;
COUNTRYWIDE SECURITIES
CORPORATION; J.P. MORGAN
SECURITIES INC.; DEUTSCHE
BANK SECURITIES INC.; BEAR,
STEARNS & CO., INC.; BANC OF
AMERICA SECURITIES LLC; UBS
SECURITIES, LLC; MORGAN
STANLEY & CO. INCORPORATED;
EDWARD D. JONES & CO., L.P.;
CITIGROUP GLOBAL MARKETS
INC.; GOLDMAN, SACHS & CO.;
CREDIT SUISSE SECURITIES
(USA) LLC; GREENWICH CAPITAL
MARKETS, INC. A.K.A. RBS
GREENWICH CAPITAL;

No. 2:10-CV-00302 MRP (MAN)

CLASS ACTION

**NOTICE OF MOTION AND
MOTION OF THE IOWA PUBLIC
EMPLOYEES' RETIREMENT
SYSTEM FOR APPOINTMENT AS
LEAD PLAINTIFF AND APPROVAL
OF LEAD PLAINTIFF'S
SELECTION OF LEAD COUNSEL**

Hon. Mariana R. Pfaelzer

Date: May 3, 2010
Time: 11:00 a.m.
Ctrm: 12

1 BARCLAYS CAPITAL INC.; HSBC
 2 SECURITIES (USA); BNP PARIBAS
 3 SECURITIES CORP.; MERRILL
 4 LYNCH, PIERCE, FENNER &
 5 SMITH, INCORPORATED;
 6 STANFORD L. KURLAND; DAVID
 7 A. SPECTOR; ERIC P. SIERACKI; N.
 8 JOSHUA ADLER; RANJIT
 9 KRIPALANI; JENNIFER S.
 10 SANDEFUR; DAVID A. SAMBOL,

11 Defendants.

12 TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

13 PLEASE TAKE NOTICE that on May 3, 2010, at 11:00 a.m. or as soon thereafter
 14 as the matter can be heard, in the courtroom of the Honorable Mariana R. Pfaelzer,
 15 situated at 312 N. Spring Street, Courtroom 12, Los Angeles, California 90012,
 16 class member Iowa Public Employees' Retirement System ("IPERS") will move,
 17 and hereby does move, this Court for an order (1) appointing it as lead plaintiff in
 18 the above-captioned action (the "Action") pursuant to the Private Securities
 19 Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. § 77z-1, *et seq.*; and (2)
 20 approving its selection of Cohen Milstein Sellers & Toll PLLC ("Cohen Milstein")
 21 as lead counsel for the class and Glancy Binkow & Goldberg LLP ("Glancy
 22 Binkow") as liaison counsel.

23 This motion is made on the grounds that IPERS timely filed this motion and
 24 is the most adequate plaintiff. IPERS has the most substantial financial interest in
 25 the relief sought by the class, and meets the requirements of Rule 23 of the Federal
 26 Rules of Civil Procedure because its claims are typical of the claims of the class and
 27 it will fairly and adequately represent the interests of the class. In addition, IPERS
 28

1 has selected and retained Cohen Milstein, a law firm which has substantial
 2 experience in prosecuting securities class actions and, in particular, has been
 3 appointed Lead Counsel in four other mortgage-backed securities class actions in
 4 which motions to dismiss have been denied.
 5

6 This motion is based on this notice of motion, the attached memorandum of
 7 points and authorities, the declaration of Michael Goldberg in support thereof, the
 8 pleadings and other files and records in the Action and such other written or oral
 9 argument as may be presented to the Court.¹
 10
 11

12 Dated: April 2, 2010

Respectfully submitted,

GLANCY BINKOW & GOLDBERG LLP

/s/ Michael Goldberg

Michael Goldberg

Lionel Z. Glancy

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1
 2 This motion is filed pursuant to Section 27 of the Securities Act of 1933 as
 3 amended by the PSLRA. This Section provides that, within 60 days after
 4 publication of the required notice, any member or members of the proposed class
 5 may apply to the Court to be appointed as lead plaintiff, whether or not they have
 6 previously filed a complaint in the underlying action. Consequently, counsel for
 7 Movant has no way of knowing who the competing lead plaintiff candidates are at
 8 this time. As a result, counsel for Movant has been unable to conference with
 9 opposing counsel as prescribed in L.R. 7-3 and respectfully requests that the
 10 conference requirement of L.R. 7-3 be waived.
 11

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20 *Attorneys for the Iowa Public Employees'*
21 *Retirement System and Proposed Lead*
22 *Counsel*
23
24
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26
27
28

**PROOF OF SERVICE VIA ELECTRONIC POSTING PURSUANT TO
CENTRAL DISTRICT OF CALIFORNIA LOCAL RULES
AND ECF GENERAL ORDER NO. 08-02**

I, the undersigned, say:

I am a citizen of the United States and am employed in the office of a member of the Bar of this Court. I am over the age of 18 and not a party to the within action. My business address is 1801 Avenue of the Stars, Suite 311, Los Angeles, California 90067.

On April 2, 2010, I caused to be served the following documents:

- 1. NOTICE OF MOTION AND MOTION OF THE IOWA PUBLIC EMPLOYEES' RETIREMENT SYSTEM FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL**
- 2. MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION OF THE IOWA PUBLIC EMPLOYEES' RETIREMENT SYSTEM FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL**
- 3. DECLARATION OF MICHAEL GOLDBERG IN SUPPORT OF MOTION OF THE IOWA PUBLIC EMPLOYEES' RETIREMENT SYSTEM FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL**
- 4. [PROPOSED] ORDER**

By posting these documents to the ECF Website of the United States District Court for the Central District of California, for receipt electronically by the following parties:

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11 There are no non-ECF registered parties in this action.

12 I certify under penalty of perjury under the laws of the United States of
13 America that the foregoing is true and correct. Executed on April 2, 2010, at Los
14 Angeles, California.

15 *s/Michael Goldberg*
Michael Goldberg